

EXHIBIT C

JASON M. SKAGGS (CA BAR NO. 202190)
JEFFREY E. FAUCETTE (CA BAR NO. 193066)
SKAGGS FAUCETTE LLP
Email: jason@skaggsfaucette.com
Email: jeff@skaggsfaucette.com
530 Lytton Avenue, 2nd Floor
Palo Alto, CA 94301
Telephone: 650/617-3226
Facsimile: 650/644-0200

Attorneys for LINKEDIN CORPORATION

UNITED STATES DISTRICT COURT

FOR THE NORTHERN DISTRICT OF ILLINOIS

WAYNE FARMS, LLC,

Plaintiff,

v.

JANE DOE AND LINKEDIN CORPORATION,

Defendants.

Case No. 20-5191

LINKEDIN CORPORATION'S RESPONSE
AND OBJECTIONS TO SUBPOENA
ISSUED BY PLAINTIFF WAYNE FARMS
LLC

SKAGGS|FAUCETTE LLP



Patrick Gomez ·

Export Manager at Wayne Farms

Wisconsin, United States · 500+ connections ·



Wayne Farms



Wisconsin School of Business

About

We are leading role model in food production and we export nationwide, our major products includes Frozen Foods such as Chicken Paw, Chicken Feet, Chicken MJW etc.....

patrickwaynefarms@consultant.com

Activity

1,913 followers

Posts Patrick created, shared, or commented on in the last 90 days are displayed here.

[See all activity](#)

Experience



Export Manager

Wayne Farms · Full-time

May 2020 – Present · 6 mos

Georgia, United States



Executive Distributor

Butchers Pride Steak & Seafood Company

Feb 2013 – May 2020 · 7 yrs 4 mos

Wisconsin, United States

Categorized under Frozen Fish, Meat, and Poultry.

LINKEDIN-WF-000001



Wholesale Sales Manager

Frozen Specialties, Inc.

Mar 2008 – Oct 2012 · 4 yrs 8 mos

Gomez_Registration.csv

Registered At	Registration Ip	Subscription Types
6/16/20, 12:51 AM	45.82.254.20	

Gomez_Logins.csv

Login Date	IP Address	User Agent	Login Type
Tue Jun 23 02:28:34 UTC 2020	66.115.157.13	LIAuthLibrary:36.0.* com.linkedin.LinkedIn:9.15.5204.4 iPhone:12.4.5	Login
Wed Jul 22 08:29:51 UTC 2020	156.146.46.65	LIAuthLibrary:36.0.* com.linkedin.LinkedIn:9.15.5204.4 iPhone:12.4.5	Login

Gomez_Email Addresses.csv

Email Address	Confirmed	Primary	Updated On
godsonnguyen101@gmail.com	Yes	Yes	6/16/20, 12:51 AM
butcherspride.frozenfoods@gmail.com	No	No	6/22/20, 7:27 PM

Gomez_Profile.csv

First Name	Last Name	Maiden Name	Address	Birth Date	Headline	Summary	Industry	Zip Code	Geo Location	Twitter Handles	Websites	Instant Messengers
Patrick	Gomez				Export Manager at Wayne Farms	<p>We are leading role model in food production and we export nationwide, our major products includes Frozen Foods such as Chicken Paw,Chicken Feet,Chicken MJW etc.....</p> <p>patrickwaynefarms@con sultant.com</p>	Food Production		Wisconsin, United States			



Bright Lincon

Salesperson at Wayne Farms

Covington, Georgia, United States ·



Best Buy



University of Oxford

Activity

Posts Bright created, shared, or commented on in the last 90 days are displayed here.

[See all activity](#)

Experience



Salesperson

Best Buy

Feb 2018 – Present · 2 yrs 9 mos

Mississippi, United States

Education



University of Oxford

Master of Business Administration - MBA, Marketing/Marketing Management, General, A

1983 – 1990

Activities and Societies: Poultry

Skills & Endorsements

Management

Marketing

Sales Management

Industry Knowledge

Account Management

Interests



University of Oxford
572,254 followers



Forbes
14,964,413 followers



LinkedIn
13,198,775 followers



Wayne Farms
11,504 followers



Bill Gates 
Co-chair, Bill & Melinda Gates Foundation
29,611,174 followers



Best Buy
384,739 followers

Lincon_Registration.csv

Registered At	Registration Ip	Subscription Types
8/31/20, 6:28 AM	197.242.101.205	

Lincon_Logins.csv

Login Date	IP Address	User Agent	Login Type
Mon Aug 31 16:05:13 UTC 2020	209.95.50.60	Mozilla/5.0 (iPhone; CPU iPhone OS 12_4_5 like Mac OS X) AppleWebKit/605.1.15 (KHTML, like Gecko) Version/12.1.2 Mobile/15E148 Safari/604.1	Login

Lincon_Email Addresses.csv

Email Address	Confirmed	Primary	Updated On
patrickwaynefarms@outlook.com	Yes	Yes	8/31/20, 6:30 AM

Lincon_Profile.csv

First Name	Last Name	Maiden Name	Address	Birth Date	Headline	Summary	Industry	Zip Code	Geo Location	Twitter Handles	Websites	Instant Messengers
Bright	Lincon				Salesperson at Wayne Farms		Food Production	30018	Covington, Georgia, United States			



Tristan Slessor

Sales Manager at Best Buy Inc

Salt Lake City, Utah, United States · 2 connections ·



T-Mobile

Activity

2 followers

Posts Tristan created, shared, or commented on in the last 90 days are displayed here.

[See all activity](#)

Experience



Independent Distributor

T-Mobile



Sales Manager

Best Buy Inc · Full-time

Mar 2013 – Present · 7 yrs 8 mos

United States

Diligent and trusted Distributor of the year

Interests



LinkedIn News

3,972,243 followers



T-Mobile

405,896 followers

Slessor_Registration.csv

Registered At	Registration Ip	Subscription Types
9/2/20, 5:05 AM	209.95.56.53	

Slessor_Logins.csv

Login Date	IP Address	User Agent	Login Type
		Mozilla/5.0 (iPhone; CPU iPhone OS 12_4_5 like Mac OS X) AppleWebKit/605.1.15 (KHTML, like Gecko) Version/12.1.2	
Wed Sep 02 13:44:54 UTC 2020	212.102.59.129	Mobile/15E148 Safari/604.1	Login

Slessor_Email Addresses.csv

Email Address	Confirmed	Primary	Updated On
patrickwaynefarms@consultant.com	Yes	Yes	9/2/20, 5:07 AM

Slessor_Profile.csv

First Name	Last Name	Maiden Name	Address	Birth Date	Headline	Summary	Industry	Zip Code	Geo Location	Twitter Handles	Websites	Instant Messengers
Tristan	Slessor				Sales Manager at Best Buy Inc		Telecommunications	84101	Salt Lake City, Utah, United States			

PROPOUNDING PARTY: WAYNE FARMS LLC

RESPONDING PARTY: LINKEDIN CORPORATION

LinkedIn Corporation (“LinkedIn”), hereby objects and responds to the subpoena (“Subpoena”) served by the attorney for Plaintiff Wayne Farms LLC (“Plaintiff”) responses and objections are based on its current understanding of the lawsuit and the Subpoena. LinkedIn reserves the right to modify or supplement its responses and objections. LinkedIn also reserves the right to make any motion with respect to the Subpoena.

GENERAL OBJECTIONS

1. LinkedIn objects to the Subpoena to the extent that it seeks the production of information from sources that are not reasonably accessible because of undue burden or cost or otherwise.

2. LinkedIn objects to the Subpoena to the extent it seeks information that is available from the parties to the litigation or other sources.

3. LinkedIn objects to the Subpoena to the extent it is intended to impose any obligations on any persons or entities other than LinkedIn, the sole entity named in the Subpoena, including but not limited to subsidiaries or affiliates of LinkedIn.

4. LinkedIn objects to the Subpoena to the extent it requests the production of information beyond the possession, custody or control of LinkedIn.

5. LinkedIn objects to the Subpoena to the extent that it seeks information protected by the attorney-client privilege, the attorney work product doctrine, or any other applicable privilege or protection from discovery under the California Code of Civil Procedure, the California Evidence Code, the California Family Code, and/or any other applicable statutes, regulations, and common law protections. LinkedIn intends to claim and hereby claims all applicable privileges and protections from discovery, and, in the event that LinkedIn provides responsive documents, any mistaken or inadvertent production of privileged or protected documents is not intended to, and shall not, waive any of these privileges or protections. LinkedIn is not presently in a position to provide a description of the nature of the information that is subject to a claim of privilege or protection. In the event the

Subpoena is found valid and enforceable, in whole or in part, LinkedIn will provide such a description within a reasonable period of time.

6. LinkedIn objects to the Subpoena to the extent it seeks trade secrets or other confidential research, development, or commercial information, or other proprietary information protected from disclosure.

7. LinkedIn objects to the Subpoena to the extent that it seeks information that is not reasonably calculated to lead to the discovery of admissible evidence.

8. LinkedIn objects to the Subpoena as overbroad and unduly burdensome.

9. LinkedIn objects to Subpoena to the extent it seeks to impose obligations beyond or inconsistent with those imposed by the applicable California statutes.

RESPONSES TO REQUEST FOR DOCUMENTS

REQUEST FOR PRODUCTION NO. 1:

All documents and information relating JOHN DOE with a fake LinkedIn profile as an employee of Wayne Farms LLC or Wayne Farms LLC USA, Phone text, WhatsApp or mobile number: +1(204) 813-6903 or +1 (323) 486-5804; Email patrickwaynefarms@consultant.com or patrickwaynefarms@outlook.com (see attached)

RESPONSE TO REQUEST FOR PRODUCTION NO. 1:

In addition to its general objections, each of which is specifically incorporated herein by reference, LinkedIn objects to this request as vague and ambiguous with respect to the scope of the information sought and the manner or production, and in particular the terms “all documents and information” which may seek information protected by privacy rights and other protections. LinkedIn also objects to the Request to the extent it requests the production of documents beyond the possession, custody or control of LinkedIn. For example, LinkedIn does not have members’ social security numbers, telephone connection records, or MAC addresses. LinkedIn also objects to the Request to the extent that it seeks the content of communications and investigations. Production of records beyond basic subscriber information as defined at 18 U.S.C. § 2703(c)(2) without the consent of the LinkedIn member would exceed the disclosure permitted under the Stored Communications Act, 18

1 U.S.C. §§ 2702-03 ("SCA"). Under the SCA, LinkedIn is prohibited from disclosing the connections
2 or content of user communications or stored files, unless a specific statutory exception permits the
3 disclosure. 18 U.S.C. §§ 2702-2703. There is no general statutory exception that would allow
4 LinkedIn to produce contents in response to your Request. LinkedIn reserves the right to add
5 objections if necessary following any meet and confer.

6 Subject to, and without waiving these objections, LinkedIn will provide the following
7 information associated with the profile associated with each of the two email addresses identified as
8 well as the Patrick Gomez profile identified (Wisconsin, United States):

- 9 • Email Addresses
- 10 • Profile Snapshot
- 11 • Profile Information
- Registration

12 LinkedIn considers this information to be fully responsive to the Request and to have satisfied
13 LinkedIn's entire obligation in responding to the Subpoena.

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15 DATED: October __, 2020.

SKAGGS FAUCETTE LLP

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17 By: _____
JASON M. SKAGGS

18 Attorneys for LINKEDIN CORPORATION.
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